UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

IN RE: Bair Hugger Forced Air Warming Products Liability Litigation	MDL No. 15-2666 (JNE/FLN)
This Document Relates to *All Cases*	**DECLARATION OF BRIDGET M. AHMANN IN SUPPORT OF DEFENDANTS' MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO EXCLUDE OPINIONS AND TESTIMONY OF TIMOTHY ULATOWSKI**

I, Bridget M. Ahmann, declare as follows:

1. I am an attorney at Faegre Baker Daniels LLP, and one of the attorneys representing 3M Company ("3M") and Arizant Healthcare Inc. ("Arizant") (collectively "Defendants") in this litigation. I submit this Declaration in support of Defendants' Memorandum in Opposition to Plaintiffs' Motion to Exclude Opinions and Testimony of Timothy Ulatowski. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

2. Attached as **Defendants' Exhibit 1 (DX1)** is a true and correct copy of the Curriculum Vitae of Timothy Ulatowski, previously attached to the June 2, 2017 Expert Report of Timothy A. Ulatowski as Exhibit A.

3. Attached as **DX2** is a true and correct copy of Mr. Ulatowski's Reliance List, previously attached to the June 2, 2017 Expert Report of Timothy A. Ulatowski as Exhibit B.

4. Attached as **DX3** is a true and correct copy of a listing of prior depositions and testimony given by Mr. Ulatowski in his capacity as an expert witness, previously attached to the June 2, 2017 Expert Report of Timothy A. Ulatowski as Exhibit C.

5. Attached as **DX4** is a true and correct copy of the September 8, 2017 Supplemental Report of Timothy A. Ulatowski.

6. Attached as **DX5** is a true and correct copy of the deposition testimony of Tim Ulatowski, taken in this action on July 7, 2017.

7. Attached as **DX6** is a true and correct copy of the June 17, 1996 FDA Letter granting 510(k) clearance for the Bair Hugger Model 505 Warming Unit.

8. Attached as **DX7** is a true and correct copy of September 6, 2000 FDA Letter granting 510(k) clearance for the Bair Hugger Model 750 Warming Unit.

9. Attached as **DX8** is a true and correct copy of the U.S. Food and Drug Administration's Premarket Notification 510(k) guidance website, last updated on August 28, 2017.

10. Attached as **DX9** is a true and correct copy of the U.S. Food and Drug Administration's July 28, 2014 guidance document, entitled "The 510(k) Program: Evaluating Substantial Equivalence in Premarket Notifications [510(k)]."

11. Attached as **DX10** is a true and correct copy of the February 5, 2014 minute order filed in *Braun, et al. v. Medtronic Sofamor Danek*, No. 2:10-cv-01283-RJS, ECF No. 535 (D. Utah Feb. 5., 2014).

12. Attached as **DX11** is a true and correct copy of the August 11, 2017 signed and notarized deposition errata sheet of Timothy A. Ulatowski.

13. Attached as **DX12** is a true and correct copy of an article by J.M. Hynson and D. I. Sessler entitled "Comparison of Intraoperative Warming Devices," submitted as part of the Bair Hugger Model 500 series 510(k) application on August 8, 1990.

14. Attached as **DX13** is a true and correct copy of the August 30, 2017 FDA Safety Alert, entitled "Forced Air Thermal Regulating Systems: Healthcare Provider Letter – Information About Use."

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 3, 2017

s/ Bridget M. Ahmann
Bridget M. Ahmann

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